

Miscellaneous Metal Parts and Products Coating RACT

SBCA-MCR-0300

The miscellaneous metal parts coatings RACT rule applies throughout the state to facilities that coat metal parts or products described by the Standard Industrial Classification Code (SIC) groups 33 through 39. These SIC codes include, but are not limited to, such groups as metal fabricators, machine tool manufacturers, electrical apparatus manufacturers, and truck trailer manufacturers to name a few. The actual regulation can be found in section NR 422.15 of the Wisconsin Administrative Code (Wis. Adm. Code).

Does this Rule Apply to my Business?

There are several exemptions to the Miscellaneous Metal Parts and Products Coating RACT.

If you are unsure if you qualify for any of these exemptions you should contact your DNR regional office or a Small Business Clean Air Assistance Program representative listed at the end.

The following processes are exempt from this rule, they include:

- ❖ Coating airplane exteriors,
- ❖ Coating marine vessels,
- ❖ Autobody refinishing,
- ❖ Customized top coating of cars and trucks if production is less than 35 vehicles per day.
- ❖ Coating operations subject to other RACT rules in ch. NR 422.
- ❖ Businesses **not** in the counties of Walworth, Racine, Kenosha, Milwaukee, Waukesha, Washington, Ozaukee, Sheboygan, Manitowoc, Kewaunee and Door have exemptions for adhesive applications, sealants used to seal or fill holes

or seams, silk screening of metal parts, and emergency vehicle manufacturing (subject to s. NR 422.155, Wis. Adm. Code).

❖ Facilities throughout the state that **never** emit more than 15 pounds of VOCs per day from all miscellaneous metal parts and products coating line(s), without use of emission control equipment, are exempt from this rule.

❖ Facilities located **in** the counties of Brown, Calumet, Dane, Dodge, Fond du Lac, Jefferson, Outagamie, Rock or Winnebago that have actual emissions of less than 10 tons of VOCs per year (about 1666 lbs per month) from all miscellaneous metal parts & products coating line(s), without use of emission control equipment, are exempt as well.

❖ Facilities located **outside** of the counties of Brown, Calumet, Dane, Dodge, Door Fond du Lac, Jefferson, Kenosha, Kewaunee, Manitowoc, Milwaukee, Outagamie, Ozaukee, Racine, Rock, Sheboygan, Walworth, Washington, Waukesha, and Winnebago that emit less than 100 tons of VOCs per year from their entire facility, calculated without the use of any emission control equipment, are also exempt.

If your facility is eligible for one of these exemptions you must keep adequate records to prove you are exempt. This could include invoices, purchase records or inventory records. Make sure your records include the appropriate information to support your exemption.

How Does My Business Comply With This Rule

If your facility is subject to this rule then you must meet the following VOC emission limits. These limits are expressed in pounds of VOC per gallon of coating, less water, as applied.

Coating Type	VOC Content Limit			
	Cured	Air Dry	Prime	Pretreatment
Clear Coating	4.3	4.3		
Extreme Performance	3.5			
High Performance Architectural**	5.8	5.8	5.4	
All other Coatings	3	3.5		
Pretreatment*				6.5

*Pretreatment limits only apply to businesses located **outside** the counties of Door, Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Walworth, Washington and Waukesha.

Architectural limits only apply to businesses that were **involved in the application of high performance architectural coatings prior to July 1, 1983 and are located **outside** the counties of Brown, Calumet, Dane, Dodge, Door, Fon du Lac, Jefferson, Kenosha, Kewaunee, Manitowoc, Milwaukee, Outagamie, Ozaukee, Racine, Rock, Sheboygan, Walworth, Washington, Waukesha and Winnebago.

Compliance Options:

- ☐ Switch to high-solids or water-based coating technology, with a VOC content lower than the applicable limit on an as applied basis;
- ☐ Implement in-line averaging, so that the daily average VOC content of coatings used on a single coating line is less than the applicable VOC content limit (low VOC coatings offset high VOC coatings). If you plan to use emission averaging compliance must be demonstrated using equations and methods specified in s. NR 422.03, Wis. Adm. Code.
- ☐ Install emission control equipment such as an incinerator to capture and destroy VOC emissions, so that the equivalent VOC content of the coatings applied is less than the applicable VOC content limit.



Contacts for More Information or Assistance.

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.



For further information on the Miscellaneous Metal Parts RACT contact your DNR Regional or Service Center office shown on the **DNR Contact Fact Sheet** or the DNR's Central office at 608/266-2856.